Exhibit	P	age .	5	

_	5	

Client RR	I/BOTT	· · · · · · · · · · · · · · · · · · ·	
Date	/19/92		_
ECC form	Sec	Pa	

from the co-ordinates every 2.5°. From this locus the total area within each contour was calculated. <u>See</u> Exhibit F.

To determine the population within the 60 dBu contour of each station, a computerized program using the Census Bureau Data Base was employed, each Census area (Block) that was encompassed within the 60 dBu contour was extracted and summed. Then this detailed information for each contour was tabulated for each county and city involved. Since the Census program from which the data was derived represents the smallest entity (Block) that the Census Bureau defines has a population less than 50 persons, an extremely accurate representation of the actual population with the contour is generated, which determines that the KCVI Construction Permit 60 dBu contour will serve a predicted 223,271 persons, and Station KRSS' licensed facility serves a calculated 87,383 persons, and Station KRSS' Class C2 facility when built will serve a predicted 107,352 persons. See Exhibit E for a detailed tabulation and summation of population served within each 60 dBu contour.

The FCC Data files for each station was extracted by computer and the data printed in Exhibit G was used in preparation of the contours for each station in compliance with FCC Rules & Regulations. Exhibit H is a comparison coverage of area and population for each of the 60 dBu contours. The population and area to be served by Station KRSS' licensed facility and its upgrade to Channel 253C2 is compared to the KCVI Construction Permit's proposed facility. Table A demonstrates that Station KRSS' present license

	- 1		 _ 1/ 3/ /	4 1	1	100	× 14
⋤.	hihit	100	Dan	Δ.	100	n	
.,,	. HILDIL		 ray	C,		<u> </u>	

- 6 -

Client RRI	BOTT_		
Date	9-92		
FCC form	Sec.	Pa.	

facility serves only 6.5% of the area to be served by the KCVI Construction Permit. Station KRSS' upgrade Class C2 facility will serve only 32.6% of the area which will be served by the KCVI Construction Permit. The same facilities serve only 39.1% and 48.1% of the population respectively as will be served by the KCVI Construction Permit.

Exhibit J shows the competitive situation in the market place served by the Bott Station KCIV licensed to Mt. Bullion. The 60 dBu coverage area of this Bott station is completely duplicated by another religious programed FM station, KFER. Station KFER's transmitter site is located within .517 km. of the Bott Station KCIV's transmitter site. Another competitive station to the Bott Station KCIV is Station KFNO, a Class B FM station licensed to Fresno, CA. The 60 dBu contour of Station KFNO overlaps the 60 dBu contour of the Bott Station KCIV by 20.6%.

Beside these three FM stations, this market is served by four (4) additional AM stations, KBIF, KIRV, KEYO, and KRDU, all of which are also religious programed stations. This completely divides the market served by Bott's Station KCIV so that his proportioned share of the population is only 59,986 persons.

The population proportioned to Bott's proposed Station KCVI in Blackfoot is 169,595. This is 2.83 times more persons than is proportioned to the Bott Station KCIV at Mt. Bullion. See Exhibit J Table C, the contour comparison coverage map page 2, and the overlap population tabulation, Table D, within the Mt. Bullion market of the Bott KCIV facility.

	2.0		
F	4-1	Page	-
Exhibit		PAGE	. /
		9-	
and the second			

- 7 -

Client	RRI/BOTT	Ľ
Date	1/19/92	
FCC form	Sec.	Pa

#### CONCLUSION.

Exhibit I Table B is a summary of facts derived from this study, which demonstrate that the area and population that will be served by the KCVI Construction Permit Class C facility is much superior to the area and population that is or will be served by Station KRSS either as a Class A or a Class C facility. The KCVI Construction Permit will serve an additional 135,888 persons within 53 towns and communities not served by Station KRSS even with the KRSS upgrade to a Class C2 facility. It shows that of the three major cities within the state of Idaho (those cities having more than 30,000 persons), two of these cities will be served by the KCVI Construction Permit, and only one will be served by Station KRSS even with its upgrade. The population to be served by the KCVI Construction Permit will be 207.09% more than that to be served by Station KRSS-with its Class C2 upgrade, and is 255.51% greater than Station KRSS' present licensed facility on Channel 252A. The area to be served by the KCVI Construction Permit will be 306.90% greater than the area to be served by Station KRSS providing its facility is constructed and put on the air according to the Commission's authorization. The area to be served by the KCVI Construction Permit will be 1518.97% greater than the area currently served by Station KRSS; i.e. the area to be served by the KCVI Construction Permit within the 60 dBu contour will be 15.19 times greater than the area within the 60 dBu contour of the present licensed operation of Station KRSS.

Exhibi	t Page	8
Sec. 1		* - *
Client	RRI/BOTT	
Date	11/19/92	

FCC form \_\_\_\_ Sec. \_\_ Pg. \_\_\_

-8-

In no way could it be considered that Station KRSS, either as a licensed Class A facility or as a Class C2 constructed facility, could be a competitive facility to such an extent to be devastating to the operation of the authorized KCVI facility. Station KRSS' facility is so limited compared to the KCVI Construction Permit facility, that even KRSS would not be competitive.

I do hereby certify that I have prepared the enclosed data and, under penalty of perjury, that data of my own knowledge is correct. As to other information and belief, I believe that information to be true.

NORWOOD J. PATTERSON

REC\NJPSTMT.BOTT

Client	RRI/BOTT
	11/19/92
FCC fc	orm Sec Pg

## **EXHIBIT IDENTIFICATION**

<u>Exhibit</u> No.	<u>Description</u>
Α	Service Contours 60 dBu KCVI Proposed CP KRSS Licensed Operation
В	Service Contours 60 dBu KCVI Proposed CP KRSS Proposed CP
C	Service Contours 60 dBu KCVI Proposed CP KRSS Licensed Operation KRSS Proposed CP With Area & Population Comparisons
D	60 dBu Contour Distance Tabulation
E	Population (Detailed Tabulation) Within 60 dBu contours
F	Area (Detailed Tabulation)
G	FCC Station Data Base Files
Н	Comparison Table Area & Population
I	Fact Sheet Summary
J	Competitive Market Comparison Study

REC\EXIBTID.BOTT

Exhibit	A Page U	
*::-:		
Client _	RRI/BOTT	
	11/19/92	
FCC fo	rm Sec Pg	

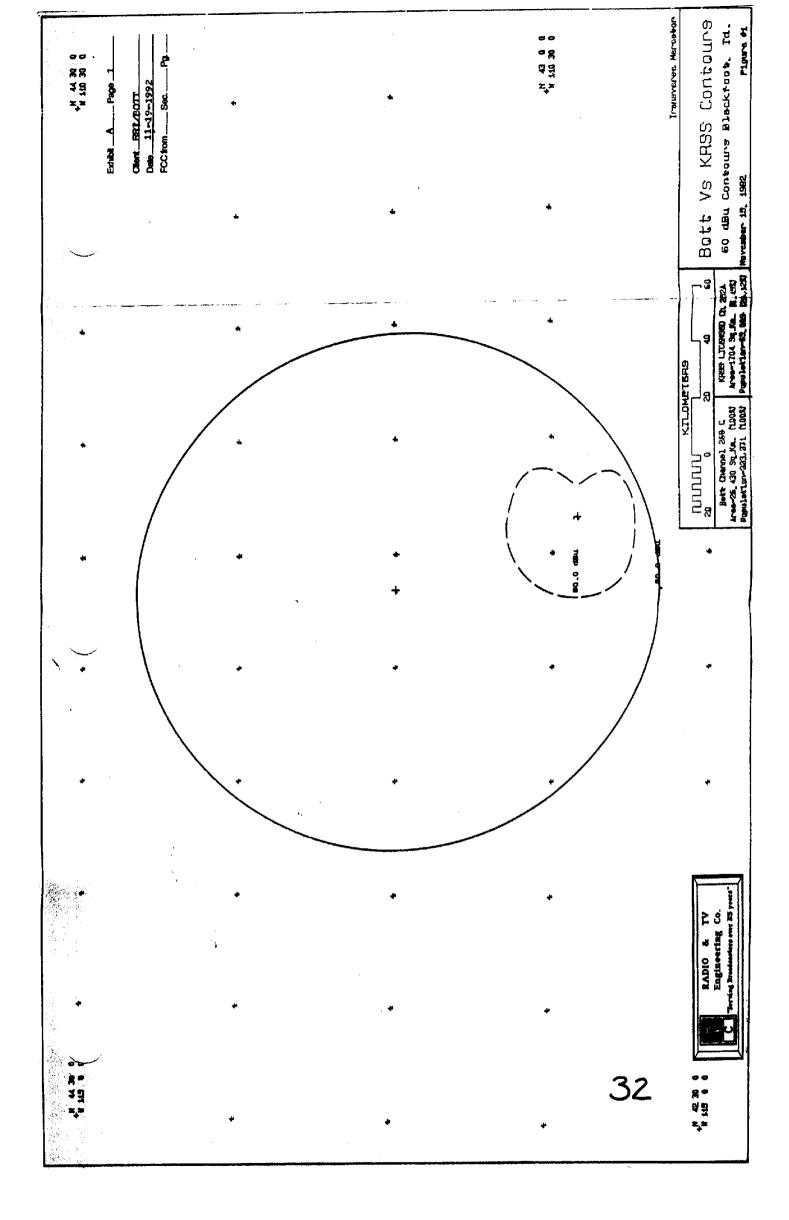
# EXHIBIT A

60 dBu SERVICE CONTOURS

BOTT CP Coverage Map Ch. 268C

With KRSS Licensed Operation Ch. 252A

REC\EXA.BOTT



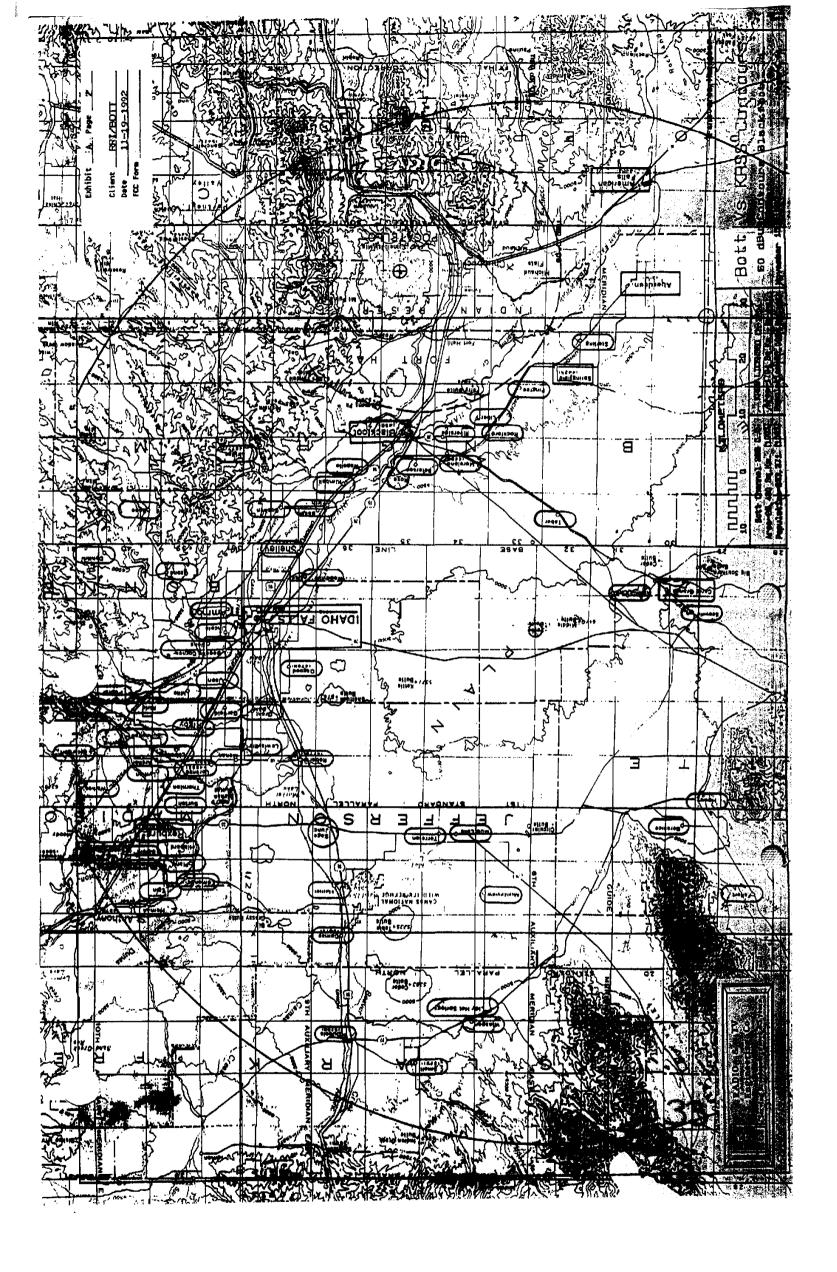


Exhibit	L_BPage _U	
Client	RRI/BOTT	
	11/19/92	
	orm Sec Pg.	

### **EXHIBIT** B

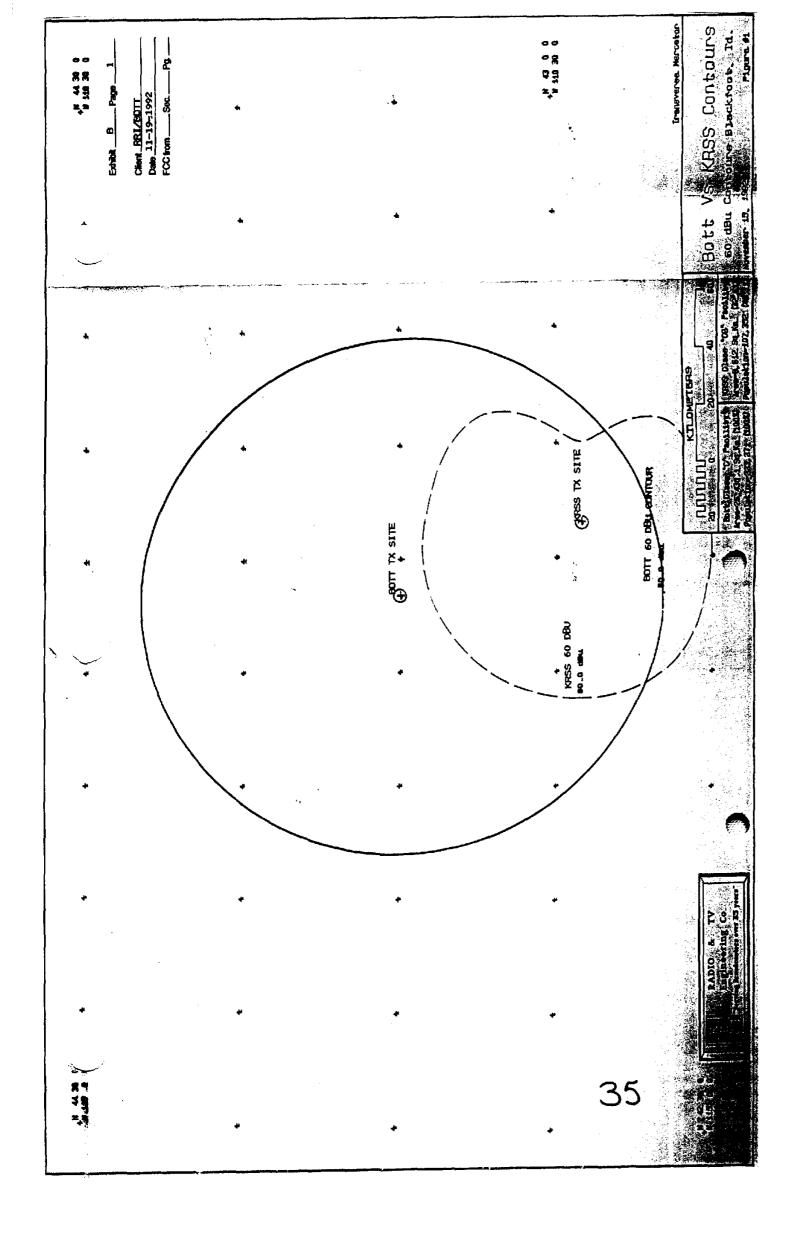
60 dBu SERVICE CONTOURS

BOTT CP Coverage Map Ch. 268C

With KRSS Coverage Map CP CH. 253C2

Cities Circle served by Bott CP not served by KRSS CP Ch. 253C2

REC\EXB.BOTT



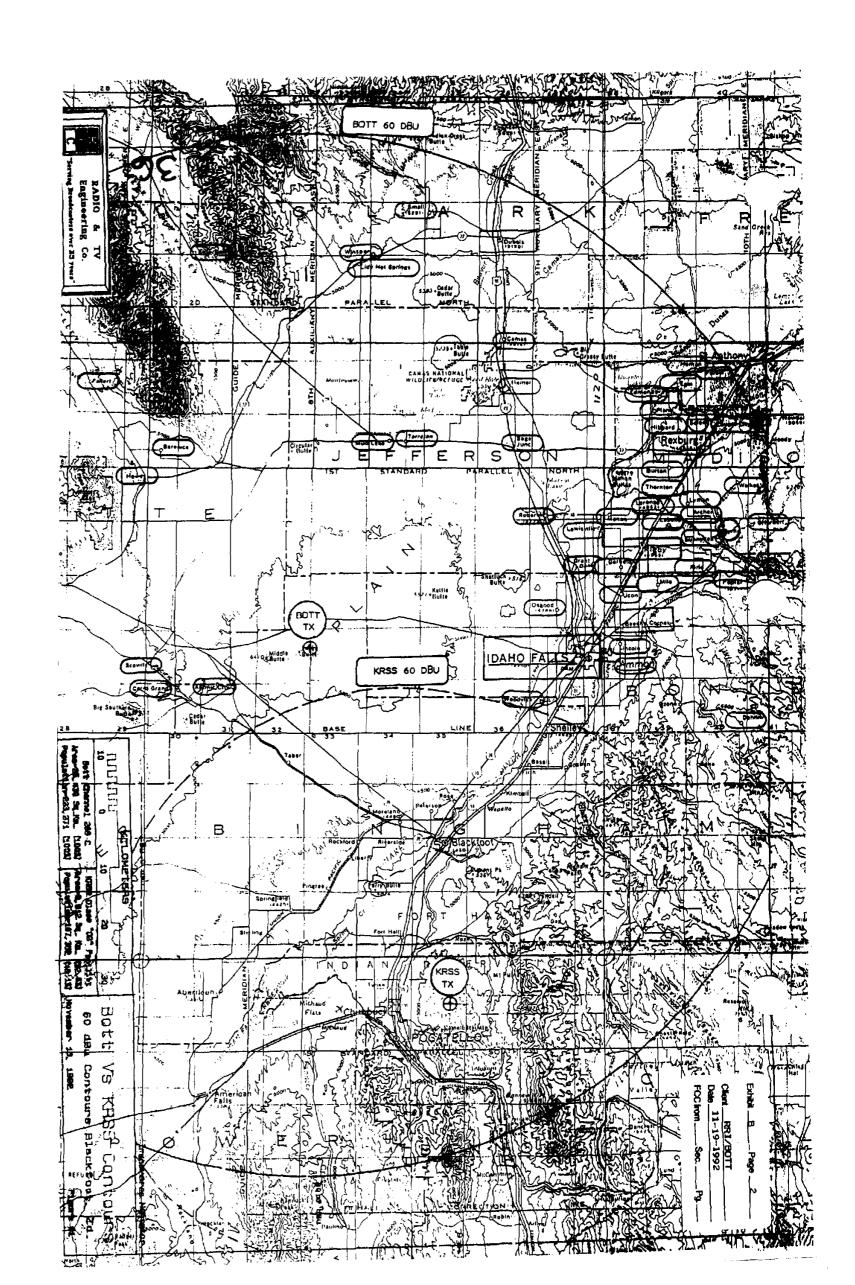


Exhibit	_CPage_(	) <u> </u>	
Client _	RRI/BOTT		
Date	11/19/92		
FCC for	rm Sec 1	Pg	The state of the s

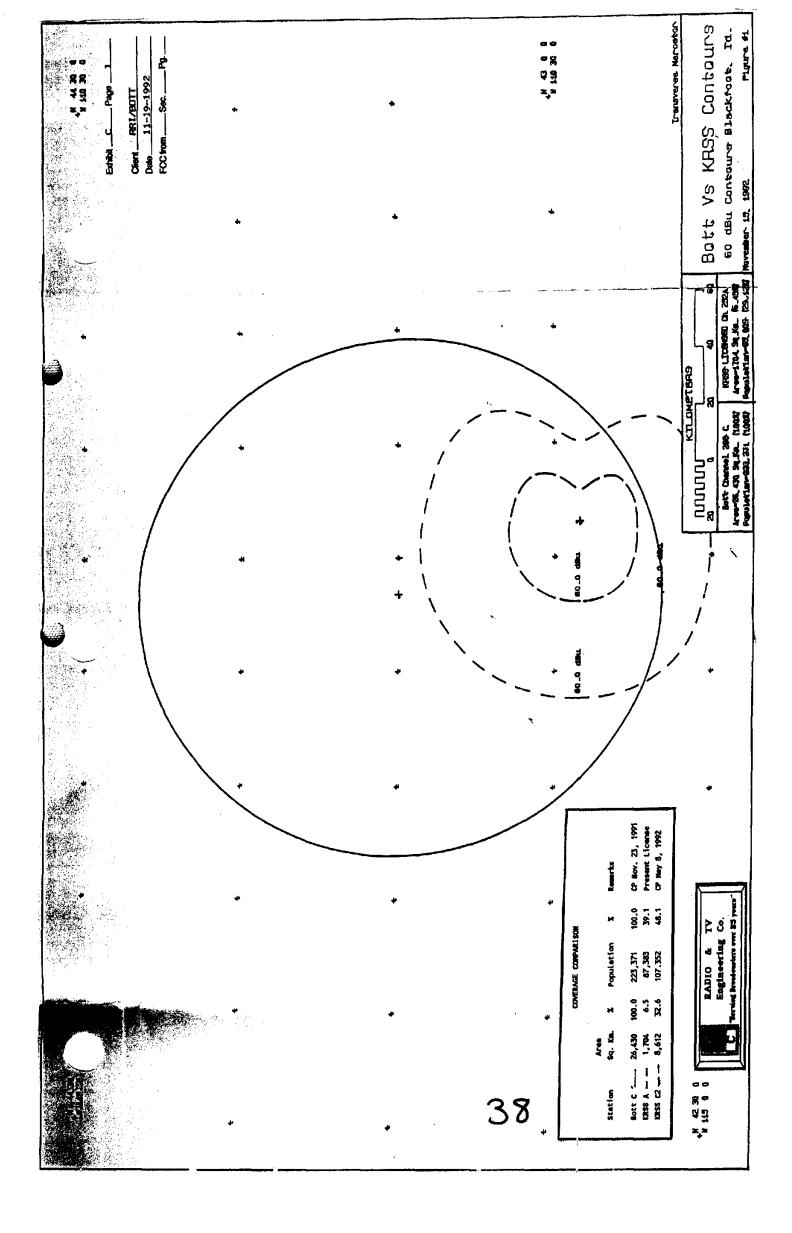
## EXHIBIT C

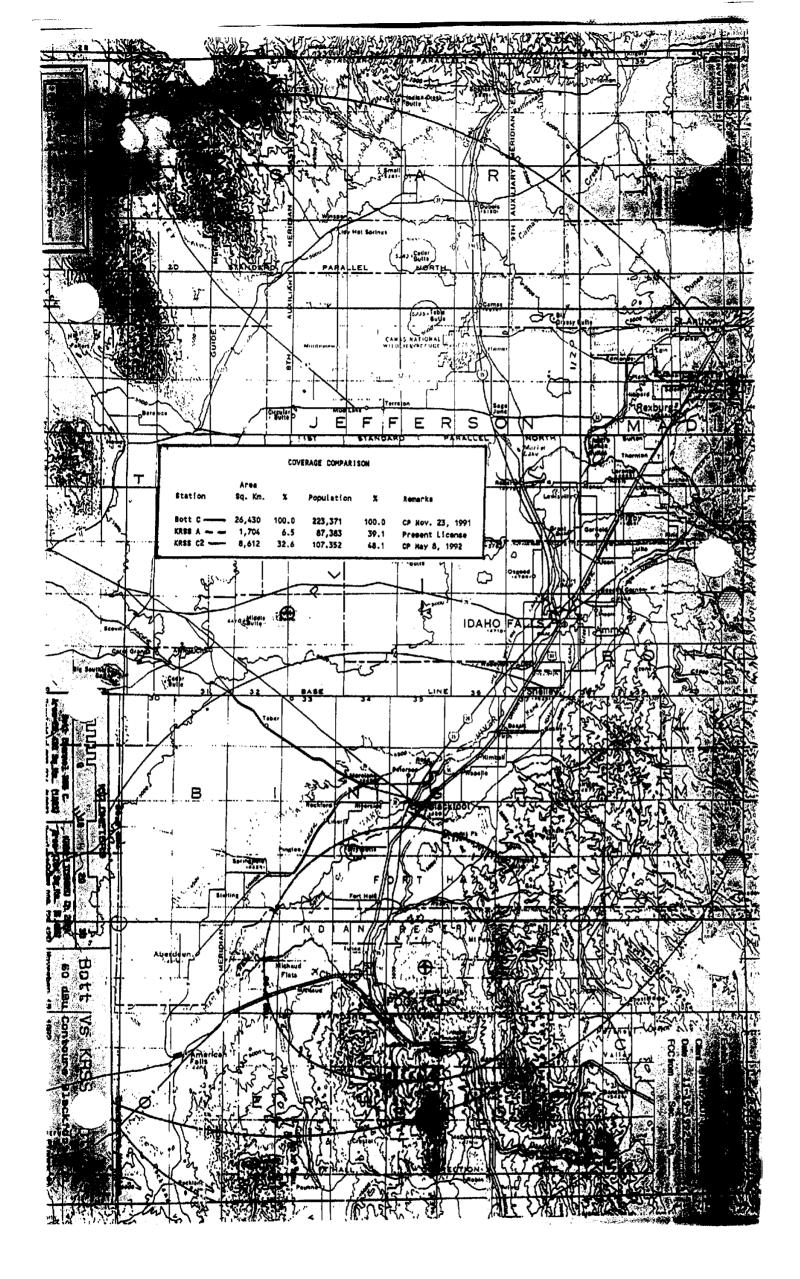
# SERVICE CONTOURS 60 dBu

- 1. BOTT CP Ch. 268C
- 2. KRSS Present License Operation Ch. 252A
- 3. KRSS CP Ch. 253C2 Not Operating

With Area and Population Comparison
Within 60 dBu Contours

REC\EXHITC.BOTT





Client RRI/BOTT	
Date 11/19/92	
FCC form Sec Pq.	

# EXHIBIT 0

## CONTOUR DISTANCE TABULATION:

- 1. **BOTT CP Ch. 268**C
- 2. KRSS Present License Operation Ch. 252A
- 3. KRSS CP Ch. 253C2 Not Operating

REC\EXHITD.BOTT

Client _	RRI/BOTT	er in der <del>Leenster</del>
	11/19/92	
FCC for	m Sec	_ Pg

# DISTANCE TO 60 dBu CONTOUR OF BOTT CP CLASS "C" AUTHORIZATION

### DISTANCES TO CONTOURS (Kilometers):

Frequency: 101.5000 MHz

Coordinates: N 43 30 3 W 112 39 43 F(50,50) Curves Number of Contours: 1

AZ (degs)	HAAT (m)	ERP (kW)	CONTOUR, LEV 60.0	ELS (dBu):
.0	603	100.0000	91.9	
45.0	537	100.0000	88.9	
90.0	562	100.0000	90.2	
135.0	622	100.0000	92.6	
180.0	650	100.0000	93.7	
225.0	596	100.0000	91.7	
270.0	609	100.0000	92.1	
315.0	618	100.0000	92.5	
	*MAX	IMUM CLASS	C FACILITY	

\*\*\* END \*\*\*

C:\cvr\bott-.con

# DISTANCE TO 60 dBu CONTOUR OF KRSS CLASS "A" PRESENT LICENSED OPERATION

#### DISTANCES TO CONTOURS (Kilometers):

Frequency: 98.3000 MHz

Coordinates: N 42 55 15 W 112 20 44 F(50,50) Curves Number of Contours: 1

AZ (degs)	HAAT (m)	ERP (kW)	CONTOUR 60.0	LEVELS	(dBu):
.0	472	.1500	24.8		
45.0	411	.1500	23.1		
90.0	98	.1500	11.2		
135.0	322	.1500	20.7		
180.0	313	.1500	20.4		
225.0	486	.1500	25.2		
270.0	612	.1500	28.7		
315.0	574	.1500	27.8		

\*\*\* END \*\*\*

C:\cvr\krss4a-.con

Client	RR	[/BO	CT.	
Date_	11,	/19/9	92	
FCC fo	orm	Sec	P	g

# DISTANCE TO 60 dBu CONTOUR OF KRSS CLASS "C2" CP AUTHORIZATION

#### DISTANCES TO CONTOURS (Kilometers):

Frequency: 98.3000 MHz Coordinates: N 42 55 15 W 112 20 44

Coordinates: N 42 55 15 W 112 20 44 F(50,50) Curves Number of Contours: 1

AZ (degs)	TAAH (m)	ERP (kW)	CONTOUR 60.0	LEVELS	(dBu):
.0	472	6.2000	55.7		
45.0	411	6.2000	52.3		
90.0	98	6.2000	28.2		
135.0	322	6.2000	47.1		
180.0	313	6.2000	46.6		
225.0	486	6.2000	56.5		
270.0	612	6.2000	63.0		
315.0	<b></b> 574	6.2000	61.6		

\*\*\* END\*\*\*

C:\cvr\krssc2a-.con

grye		0
Client	RRI/BOTT	
Date _	11/19/92	
FCC fo	rm Sec Pg	

#### EXHIBIT E

POPULATION DETAILED TABULATION OF PERSONS WITHIN 60 dBu Contour:

- 1. BOTT CP Ch. 268C
- 2. KRSS Present License Operation Ch. 252A
- 3. KRSS CP Ch. 253C2 Not Operating

NOTE: 1990 Census Computerized Data by Census Block

Census blocks are the smallest census entity with a population per block of less than 50 persons. This produces a very high degree of accuracy of the population calculation within a station's coverage contour.

This Exhibit also documents the cities served by Bott but not served by KRSS even with its C2 upgrade.

REC\EXE.BOTT

# POPULATION WITHIN THE 60 dBu CONTOUR OF BOTT CP CH 268C

Input file name: c:\cvr\bott.con

Population Count Results - Contour: 1

#### TOTAL POPULATION

State, County, City	Households	White	Hispanic	Black	Am Indian	Asian	Other	Total
Idaho	78,167	203,653	12,284	767	4,469	1,973	125	223,271
Bennock County Chubbuck city	2,593	7,224	316	26	151	73	1	7,791
Fort Hall CDP	452	723		0	562	6	Õ	1,368
Inkom city	252	757	8	0	2	2	0	769
Pocatello city	18,716	42,346	2,084	380	554	571	36	45,971
Rural county	1,916	5,516	166	4	232	27	1	5,946
Total for County	23,929	56,566		410	1,501	679	38	61,845

なな

Client RR I / Bi
Date 11/19

Page	-2-

Bingham County								
Aberdeen city	601	1,124	267	2	6	6	1	1,406
Atomic City city	20	20	5	0	0	0	0	25
Basalt city	128	362	38	0	7	0	0	407
Blackfoot city	3,614	8,348	935	4	218	127	14	9,646
Firth city	149	349	77	0	1	2	0	429
Fort Hall CDP	429	160	238	2	910	1	0	1,311
Shelley city	1,070	3,173	322	7	16	14	4	3,536
Rural county	6,574	17,891	1,732	16	1,051	114	14	20,818
Total for County	12,585	31,427	3,614	31	2,209	264	33	37,578
Blaine County		,as						
Rural county	1	2 2	0	0	0	0	0	2 2
Total for County	1	2	0	0	0	0	0	2
Bonneville County								
Ammon city	1,336	4,830	122	8	17	24	1	5,002
<b>Idaho Fall</b> s city	16,843	41,083	1,837	248	227	521	13	43,929
Iona city	311	1,014	29	5	1	0	0	1,049
Ririe city	22	71	3	0	0	0	0	74
Ucon city	263	831	44	0	13	6	1	895
Rural county	6,561	19,418	971	19	83	111	11	20,613
Total for County	25,336	67,247	3,006	280	341	662	26	71,562
Butte County	: :							
Arco city	485	950	51	0	14	1	0	1,016
Butte City city	39	59	0	0	0	0	0	59
Moore city	82	185	4	0	1	0	0	190
Rural county	641	1,577	46	0	6	4	0	1,633

CC from Sec.

rage -3-	Page	-3-
----------	------	-----

Total for County	1,247	2,771	101	0	21	5	0	2,898
Caribou County								
Rural county	29	54	0	0	0	0	0	54
Total for County	29	54	0	0	0	0	0	54
Clark County			•					
Dubois city	205	401	'' 17	0	2	0	0	420
Rural county	64	106	50	Ŏ	Ö	Ö	Ŏ	156
Total for County	269	507	67	Ö	2	Ö	Ŏ	576
Custer County								
Lost River city	18	18	11	0	0	0	0	29
Mackay city	338	566	3	ĭ	4	Ö	ŏ	574
Rural county	258	429	5	Ô	å	Ö	ŏ	437
Total for County	614	1,013	19	1	3 7	Ö	Ŏ	1,040
Fremont County								
Parker city	84	262	5	0	0	0	0	267
Rural county	375	1,212	66	2	. 0 7	2	Ŏ	1,289
Total for County	459	1,474	71	2 2	7	2 2	ŏ	1,556
Jefferson County								
Hamer city	29	63	15	0	1	0	0	79
Lewisville city	148	406	60	Ŏ		Ö	Ö	471
Menan city	187	525	75	0	5 0	ì	Ŏ	601
Mud Lake city	80	170	7	Ö	2	ô	Ŏ	179
Rigby city	969	2,431	218	2	20	10	Ö	2,681
المحم المقت	707	21201	210	L	20	10	U	2,001

FCC from \_\_\_\_ Sec. \_\_\_Ps

七九

•	Page -3-							
Ririe city	215	499	21	0	2	0	0	522
Roberts city	167	321	233	0	1	0	2	557
Rural county	3,540	10,804	526	1	78	29	15	11,453
Total for County	5,335	15,219	1,155	3	109	40	17	16,543
Madison County								
Resburg city	3,554	13,539	441	33	71	211	7	14,302
Sugar City city	301	1,186	· 65	1	2	21	0	1,275
Rural county	2,162	7,509	178	0	15	56	0	7,758
Total for County	6,017	22,234	684	34	88	288	7	23,335
Power County								
American Falls city	1,453	3,138	552	3	32	29	3	3,757
Arbon Valley CDP	217	540	53	2	14	4	0	613
Pocatello city	22	52	1	0	0	0	0	53
Rural county	654	1,409	310	1	138	0	1	1,859
Total for County	2,346	5,139	916	6	184	33	4	6,282

## POPULATION 18 AND OVER

State, County, City	Households	White	Hispanic	Black	Am Indian	Asian	Other	Total
Idaho	78,167	133,495	6,875	534	2,737	1,372	59	145,072
Bannock County Chubbuck city	2,593	4,405	162	19	75	44	1	4,706

trom\_\_\_\_\_ Sec. \_\_

84

			]	Page -4-				
Fort Hall CDP	452	526	34	0	336	3	0	899
Inkon city	252	460	1	0	1	2	. 0	464
Pocatello city	18,716	29,746	1,218	278	362	431	17	32,052
Rural county	1,916	3,522	97	3	148	13	0	3,783
Total for County	23,929	38,659	1,512	300	922	493	18	41,904
	·	•	•					•
Bingham County		*	. •					
Aberdeen city	601	798	' 153	2	5	2	1	961
Atomic City city	20	20	2	0	0	0	0	22
Basalt city	128	230	22	0	4	0	0	256
Blackfoot city	3,614	5,606	503	2	138	88	7	6,344
Firth city	149	229	38	0	1	2	0	270
Fort Hall CDP	429	122	133	2	527	1	0	785
Shelley city	1,070	1,902	148	3	9	5	0	2,067
Rural county	6,574	10,653	959	6	652	75	9	12,354
Total for County	12,585	19,560	1,958	15	1,336	173	17	23,059
Blaine County								
Rural county	1	2	0	0	0	0	0	2
Total for County	1	2	• 0	0	0	0	0	2
Bonneville County			4					
Ammon city	1,336	2,749	64	4	10	16	0	2,843
Idaho Falls city	16,843	28,077	1,040	158	149	349	2	29,775
Iona city	311	606	12	2	1	0	Ō	621
Ririe city	22	45	2	0	ō	Ŏ	Ō	47
Ucon city	263	500	22	Ŏ	6	2	Ŏ	530
Rural county	6,561	11,896	529	14	44	7 <del>5</del>	4	12,562
Total for County	25,336	43,873	1,669	178	210	442	6	46,378
	—— • - <del></del>		-,		<del></del> -	<del>-</del>	-	,

FCC from

Sec. -

-Pg.

64

Page	-5-

Butte County Arco city Butte City city Moore city Rural county Total for County	485 39 82 641 1,247	664 42 116 980 1,802	31 0 2 29 62	0 0 0 0	6 0 1 5	1 0 0 1 2	0 0 0 0	702 42 119 1,015 1,878
Caribou County Rural county Total for County	29 29	32 32	,, 0 0	0	0 0	0	0	32 32
Clark County Dubois city Rural county Total for County	205 64 269	281 60 341	10 47 57	0 0 0	2 0 2	0 0 0	0 0 0	293 107 400
Custer County Lost River city Mackay city Rural county Total for County	18 338 258 614	14 401 291 706	5 1 5 11	0 1 0 1	0 4 2 6	0 0 0 0	0 0 0	19 407 298 724
Fremont County Parker city Rural county Total for County	84 375 459	146 669 815	3 45 48	0 2 2	0 4 4	0 2 2	0 0 0	149 722 871
Jefferson County Hamer city	29	45	11	0	1	0	0	57

Client RRI/BOTT

Date 11/19/92

FCC form Sec. Pg.

50